

Exhibit “E”

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

VERONICA BROWN, _____X

Docket No.: 14-CV-5960

Plaintiff,

AFFIDAVIT

-against-

MARRIOTT INTERNATIONAL, INC.,

Defendant. _____X

IN THE FEDERATION OF ST. KITTS & NEVIS, WEST INDIES

JACQUES HAMOU, after being duly sworn, deposes and says:

1. I have personal knowledge of the facts set forth in this Affidavit and am competent to testify to them if called upon to do so.
2. I am the [*General Manager?*] of the St. Kitts Marriott Resort and The Royal Beach Casino, located in Frigate Bay, St. Kitts & Nevis ("the Hotel"). I am employed by Luxury Hotels International Management St. Kitts Limited ("LHI"), whose role is explained below, and as such I am authorized to execute this Affidavit on behalf of the Hotel and LHI.
3. The Hotel is owned by Royal St. Kitts Beach Resort Limited ("RSK"), a company formed under and existing according to the laws of the Federal of St. Kitts & Nevis.
4. RSK is not authorized to, nor does it, transact business in any jurisdiction aside from St. Kitts & Nevis.
5. Prior to July 18, 2013, RSK entered in a contract with Marriott St. Kitts Management Company Inc. to handle the on-site management and operations of the Hotel. I am advised by Marriott's counsel that a copy of that contract is attached as an exhibit to these motion papers. Marriott St. Kitts Management Company Inc. later changed its name to

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"Luxury Hotels International Management St. Kitts Limited." LHI is currently responsible for the operation and management of the Hotel, as it was on July 18, 2013.

6. LHI is not authorized to, nor does it, transact business in any jurisdiction aside from St. Kitts & Nevis.

7. Plaintiff's amended complaint alleges that she slipped and fell in a guest room at the Hotel on July 18, 2013.

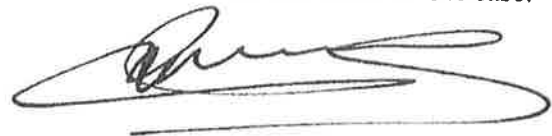
8. Workers at the Hotel, including housekeeping staff and maintenance workers, are interviewed, hired, trained, supervised, and paid by LHI pursuant to LHI's obligations under the aforementioned contract with RSK.

9. Aside from plaintiff and her companion, all witnesses to the alleged accident and the alleged circumstances that led to it, including LHI employees, maintenance personnel, housekeeping personnel, as well as emergency personnel, and police and local doctors, are all located in St. Kitts & Nevis. This includes the current Loss Prevention Supervisor of the Hotel, who is employed by LHI.

10. It would be a great inconvenience, as well as prohibitively expensive, for the employees of LHI who are and were directly involved in the operation of the Hotel if they were asked to appear in Federal Court in the State of New York as witnesses to this case.

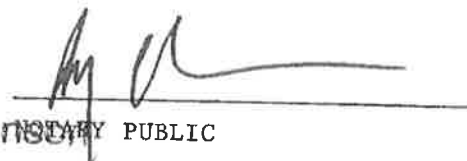
Further affiant sayeth naught.

Dated: August 25 2015
 , St. Kitts & Nevis



Jacques Hamou
 [General Manager – name]

Before and in the presence of:-



Anthony L. Johnson
 Notary Public
 St. Kitts/Nevis

